

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

DURA AUTOMOTIVE SYSTEMS, LLC, *et al.*,¹

Debtors.

Chapter 7

Case No. 19-12378 (KBO)

(Jointly Administered)

Re: Docket No. 1415

**CERTIFICATION OF COUNSEL REGARDING UNOPPOSED MOTION OF LYNN
TILTON AND KEVIN GRADY FOR AN ORDER AUTHORIZING PAYMENT OF
DEFENSE COSTS AND OTHER LOSS UNDER DIRECTORS AND OFFICERS
LIABILITY INSURANCE POLICIES**

The undersigned counsel for Lynn Tilton and Kevin Grady (the “**Movants**”) hereby certifies as follows:

1. On June 21, 2022, the Debtors filed the *Unopposed Motion of Lynn Tilton and Kevin Grady for an Order Authorizing Payment of Defense Costs and Other Loss Under Directors and Officers Liability Insurance Policies* [Docket No. 1415] (the “**Motion**”).

2. The notice of the Motion [Docket No. 1415-1] established July 12, 2022 at 4:00 p.m. (Eastern) as the deadline (the “**Objection Deadline**”) for receipt of objections to the Motion. The Movants extended the Objection Deadline for counsel to ACE American Insurance Company and its U.S.-based affiliates and successors (“**Chubb**”) until July 13 at noon ET. No additional extensions of the Objection Deadline were granted by the Movants.

3. Chubb provided informal comments to the proposed order which have been incorporated into the revised proposed order attached as **Exhibit A** hereto.

4. The Trustee and the U.S. Trustee have reviewed the revisions to the proposed order and have informed the Movants that neither party objects to the revisions or the revised proposed order.

5. For the Court's convenience, a redline showing changes to the proposed order filed with the Motion is annexed hereto as **Exhibit B**.

6. The Movants respectfully request that the Court enter the proposed order annexed as **Exhibit A** hereto.

Dated: Wilmington, Delaware
July 14, 2022

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EXHIBIT A

Revised Proposed Order

EXHIBIT B

Redline Order